

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

DARREN HUFFMAN,)	
Plaintiff,)	
)	Civil No. 3:22-cv-02029-NJR
vs.)	
)	
UNITED STATES STEEL)	
CORPORATION,)	
d/b/a US Steel,)	
Defendant.)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

COMES NOW Plaintiff, by and through counsel, and in support of his Motion for Leave to File Amended Complaint, states:

1. Plaintiff filed this Complaint on or around August 31, 2022
2. The current Complaint entails events that occurred between 2014 and 2016. Dkt. #1.
3. On February 7, 2024, Plaintiff received another right to sue letter for conduct which occurred during his employment with Defendant. See Exhibit A.
4. The conduct at issue in Case No. 3:24-cv-01203-RJD involves events that occurred between 2016 and 2023.
5. In the interest of judicial economy, Plaintiff sought consent from Defendant's attorneys to consolidate those cases.
6. Defendant has not yet responded.
7. As noted in the concurrently filed Motion to Consolidate, in order to preserve Plaintiff's rights, Plaintiff filed the two claims related to the February 7, 2024

right to sue letter as a separate case on May 2, 2024, Case No. 3:24-cv-01203-RJD.

8. Plaintiff has attached a Proposed Amended Complaint in redline/underlined fashion, marked as Exhibit 2.
9. This Motion is not made for vexatious purposes or delay.
10. Plaintiff files this Motion in the belief that combining the two cases, whether through amendment or consolidation, makes sense from a judicial economic point of view and will save the parties time and costs.
11. Plaintiff files this Motion to preserve Plaintiff's rights as well as to grant this Court options if it decides that combining the matters is proper.

WHEREFORE, Plaintiff respectfully prays that this Court grant Plaintiff's Motion for Leave to File Amended Petition, and for all other relief deemed equitable and just.

Filed: May 6, 2024

Respectfully submitted,

LAW OFFICES OF DERALD L. GAB, P.C.

/s/ Bret Kleefuss
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CERTIFICATE OF SERVICE

The undersigned certifies that this was efiled on today, May 6, 2024, with the Eastern District of Missouri ecf system which served the document on Defendant at adam.hirtz@jackson lewis.com.

/s/Bret Kleefuss
Bret Kleefuss